



Illinois Environmental Protection Agency

2009 Mall Street, Collinsville, Illinois 62234

618/345-4606

EPA Region 5 Records Ctr.



382833

Refer to: LPC 1190200002 - Madison County - East Alton/Olin Corporation:  
ILD006271696 Main Plant

January 31, 1985

Olin Corporation  
Shamrock Street  
East Alton, Illinois 62024

Attention: L. W. Maxson

Dear Mr. Maxson:

On October 24 and November 28, 1984, a representative of the Illinois Environmental Protection Agency (IEPA) conducted an inspection of your facility. The purpose of the inspection was to determine your facility's compliance with the Environmental Protection Act, Ill. Rev. Stat. 1982, Ch. 111 1/2 pars. 1001 et seq., as amended and regulations adopted by the Illinois Pollution Control Board pursuant to Interim Status Standards. Those specific areas addressed during the aforementioned inspection of November 28, 1984 have been determined to be in general compliance.

A copy of the inspection report has been enclosed for your information. Should you have any questions, please contact Tom Powell of my staff at the above number.

Very truly yours,

ENVIRONMENTAL PROTECTION AGENCY

Kenneth G. Mensing  
Southern Regional Manager  
Division of Land Pollution Control

TEP:jlr

Enclosure: RCRA Inspection Report

cc: LPC Division File  
Southern Region File ✓



DATE: January 31, 1985  
TO: Division File  
FROM: Tom Powell - Southern Region  
SUBJECT: LPC 1190200002 - Madison County - East Alton/Olin Corporation: Main Plant  
ILD006271696

On October 24, 1984, a "Part B" site visit was conducted at the subject facility. Inspection participants included Juana Rojo, USEPA, Region V Permit reviewer; Wally El-Beck, IEPA Permit Section, Wayne Galler and Bob Mooshegian of Olin, as well as this writer.

During the visit all of Olin's Hazardous waste storage/treatment sites were briefly visited to familiarize Rojo and El-Beck with specific management units within the facility. Specific "paper" requirements were not inspected thoroughly because of the number of units and time constraints. However, some personnel records, inspection schedules, manifests and operating records were reviewed.

While inspecting the drum storage area of the Material Reclamation Facility (MRF), several drums, (USDOT Type 17-H) containing mercury contaminated scrap ammo, (Hazardous due to lead D008) did not have secure lids. Drums containing magnesium scrap were observed leaking a white milky material. Olin representatives stated the material was cutting oil.

On November 28, 1984, this inspector returned to the facility to observe units not previously inspected during the 7/26,27/84 site visit and to observe if the drums within the MRF have been secured and/or repacked. During this visit, sites 1-3, 1-4, 1-5, 4-8, 4-9 and 4-2a were visited and reviewed completely for required paperwork. As a result of this subsequent visit, the above violations (725.271, 725.273(a)) observed on 10/24/84 were resolved. All lids were secure and the leaky drums replaced by new ones.

As a result of this subsequent visit a question arose concerning the Operating Record for sites 1-3, 1-4 and 1-5. Olin records the number of kills for those days when "kills" actually take place, but for the days when no "kills" take place the operating record is left blank. It was pointed out that an operator could easily forget to record the number of kills and not log the data in the operating record. As a result, Wayne Galler told this writer on December 20, 1984, that instead of leaving the operating record blank, a "0" (or some other symbol) will be recorded in the Operating record thus eliminating the chance that an operator would fail to record the number of kills.

1190200002  
Madison County  
East Alton/Olin Corporation: Main Plant  
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January 31, 1985

Olin is no longer using their "Hazardous Waste Interzone Shipment Log". Per Olin's response, dated 8/31/84, from the last ISS Inspection, Olin will use the uniform manifest effective 9/20/84 for all interzone shipments of Hazardous waste as well as for waste leaving the facility for off-site destinations. Shipments of waste that are not transported on public roads are not manifested.

Olin's personnel training records have been modified slightly in that written job descriptions are now contained in the job training outlines. Records that document employee training are listed on a computer printout because persons in some departments were not signing off that they had received training due to a union/labor relations situation. Apparently the company could not force employees to sign the document because of the union. (Similar situation exists at Zone 17.)

As a result of the two site visits the facility now appears to be in general compliance with interim status standards for those units that were inspected or reinspected on November 28, 1984.

TEP:jlr

cc: Southern Region File